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MAUMOYNIER and MATTHEW TURNER

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

ANTHONY BALBIANI, an individual,

Plaintiff,

v.

CHESTER PUBLIC UTILITY DISTRICT, INC.,  
a local government entity;  
MATTHEW MAUMOYNIER, an individual;  
MATTHEW TURNER, an individual; BRIAN  
LAYNE, an individual; and  
DOES 1 –through 20, inclusive.

Defendants.

Case No.: 2:20–CV–02310–TLN–DMC

**ORDER RE: STIPULATION TO EXTEND  
DISCOVERY AND LAW AND MOTION  
DEADLINES**

Complaint Filed: November 19, 2020

Trial Date: None

Plaintiff Anthony Balbiani (“Plaintiff”), and Defendants Chester Public Utility District, Inc., Matthew Maumoynier, and Matthew Turner (collectively referred to as “Defendants”), by and through their attorneys hereby stipulate and seek Court approval for the following:

WHEREAS, on August 25, 2021, the Parties stipulated to, and the Court granted their request to extend discovery and law and motion deadline, which provides a deadline of May 2, 2022, for non-expert discovery;

WHEREAS, the parties have continued to meet and confer on written discovery requests and responses, and the scheduling of depositions;

WHEREAS, some depositions that were previously scheduled in December had to be reschedule due to conflicts in the Parties’ schedule and the winter storm that caused a power outage in Northern California;

WHEREAS, Defendant started Plaintiff’s deposition February 9, 2022, but has not completed his deposition;

WHEREAS Defendants Matthew Maumoynier and Matthew Turner will not be available until April for their depositions;

WHEREAS, the Parties have not completed written discovery or depositions, and considering the foregoing, a non-expert discovery deadline of May 2, 2022, will not provide the Parties sufficient time

1 to complete fact discovery before the cut-off;

2 WHEREAS, the Parties had several delays in completing discovery last year because of the  
3 extreme fire season;

4 WHEREAS, the Parties have agreed to extend the discovery cut-off deadline; and

5 WHEREAS, a trial date has not been set;

6 **STIPULATION**

7 THEREFORE, it is hereby stipulated and agreed by the parties, as follows:

8 1. The deadline for non-expert discovery shall be extended to July 5, 2022;

9 2. Expert disclosures shall be made by September 5, 2022 (60 days after close of  
10 discovery);

11 3. Dispositive motion shall be filed no later than January 3, 2023 (180 days after close of  
12 discovery); and

13 4. Joint Notice of Trial Readiness shall be filed by November 2, 2022 (120 days after close  
14 of discovery).

15 IT IS HEREBY STIPULATED

16 Date: February 18, 2022

LAW OFFICES OF TANYA GOMERMAN

17 By: \_\_\_\_\_

18 Maria A. Bourn, Esq.  
19 Attorney for PLAINTIFF  
ANTHONY BALBIANI

20 Date: February 18, 2022

21 ALLEN, GLAESSNER, HAZELWOOD  
AND WERTH, LLP

22 By: \_\_\_\_\_

23 Peter Glaessner, Esq.  
24 Kellen Crowe, Esq.  
Attorney for DEFENDANTS CHESTER  
PUBLIC UTILITY DISTRICT and  
25 BRIAN LAYNE

26 Date: February 18, 2022

MAIRE & DEEDON

27 By: \_\_\_\_\_

28 Patrick Deedon, Esq.  
Attorney for DEFENDANTS MATTHEW  
MAUMOYNIER and MATTHEW TURNER

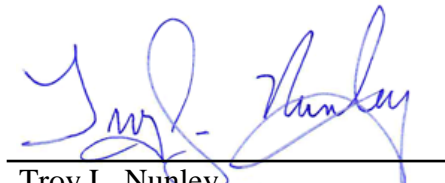
**ORDER**

This Court has reviewed and considered the above stipulation among the Parties. For good cause shown, it is hereby **ORDERED** as follows:

1. The deadline for non-expert discovery shall be extended to **July 5, 2022**;
2. Expert disclosures shall be made by **September 6, 2022**;
3. Dispositive motion shall be filed by **January 3, 2023**; and
4. Joint Notice of Trial Readiness shall be filed by **November 2, 2022**.

**IT IS SO ORDERED.**

Dated: February 18, 2022

  
\_\_\_\_\_  
Troy L. Nunley  
United States District Judge